

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Niyah Smith-Walker
Sheldon L. Walker**

Debtor(s)

**U.S. BANK NATIONAL ASSOCIATION, (AS
TRUSTEE FOR THE PENNSYLVANIA HOUSING
FINANCE AGENCY)**

Movant

vs.

**Niyah Smith-Walker
Sheldon L. Walker**

Respondent(s)

BK NO. 18-13616 MDC

Chapter 13

Hearing Date: 11/08/2018

**OBJECTION OF U.S. BANK NATIONAL ASSOCIATION, (AS TRUSTEE FOR THE
PENNSYLVANIA HOUSING FINANCE AGENCY)
TO CONFIRMATION OF CHAPTER 13 PLAN**

U.S. BANK NATIONAL ASSOCIATION, (AS TRUSTEE FOR THE PENNSYLVANIA HOUSING FINANCE AGENCY) (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On September 10, 2018, Secured Creditor filed a secured proof of claim setting forth pre-petition arrears in the amount of \$41,854.25.
2. Debtor's Plan provides for payment in the amount of \$24,246.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$17,608.25, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, U.S. BANK NATIONAL ASSOCIATION, (AS TRUSTEE FOR THE PENNSYLVANIA HOUSING FINANCE AGENCY), prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: September 14, 2018

By: /s/ Rebecca A. Solarz, Esquire

Rebecca A. Solarz, Esquire
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
215-627-1322
Attorney for Movant/Applicant